

James J. Pisanelli, Esq., Bar No. 4027
JJP@pisanellibice.com
Debra L. Spinelli, Esq., Bar No. 9695
DLS@pisanellibice.com
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
Telephone: (702) 214-2100

Kevin D. Tessier, Esq. (admitted *pro hac vice*)
ktessier@reedsmith.com
Karen E. Vaysman, Esq. (admitted *pro hac vice*)
kvaysman@reedsmith.com
REED SMITH LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507
Telephone: (312) 207-1000

*Attorneys for Rocky Mountain Hospital and Medical
Service, Inc. d/b/a Anthem Blue Cross and Blue Shield and
HMO Colorado Inc. d/b/a HMO Nevada*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC

Plaintiff,

vs.

ROCKY MOUNTAIN HOSPITAL AND
MEDICAL SERVICE, INC. d/b/a ANTHEM
BLUE CROSS AND BLUE SHIELD; HMO
COLORADO INC. d/b/a HMO NEVADA

Defendants.

Case No.: 2:18-cv-00761-RFB-GWF

**STIPULATION AND ORDER TO EXTEND
DISCOVERY STAY**

(Second Request)

Plaintiff Sunrise Hospital and Medical Center, LLC (“Plaintiff”) and Defendants Rocky Mountain Hospital and Medical Service, Inc. d/b/a Anthem Blue Cross and Blue Shield and HMO Colorado Inc. d/b/a HMO Nevada (“Defendants”, and collectively with Plaintiff, the “Parties”) submit the following Stipulation and Order to Extend Discovery Stay:

1 1. On March 14, 2019, the Parties submitted a Status Report and Stipulation to Stay
2 Discovery in which they reported the Parties' agreement to pursue private mediation and requested to
3 stay discovery for fourteen (14) days to allow for the selection of a mediator and mediation date.
4 (Dkt. 45.) The Parties also stipulated to provide the Court with a status report concerning the
5 scheduling of the mediation and the Parties' agreement as to an extension of the stay of discovery
6 pending mediation on or before March 29, 2019. (Dkt. 45.) The Court entered the Stipulation and
7 Order on March 15, 2019. (Dkt. 46.)

8 2. On March 29, 2019, the Parties submitted a Status Report (Dkt. 48) and Stipulation to
9 Extend the Discovery Stay (Dkt. 50) in which they reported that the Parties' efforts to select a mediator
10 and mediation date are ongoing and requested to extend the discovery stay for an additional fourteen
11 (14) days. The Parties also stipulated to provide the Court with a status report concerning the
12 scheduling of the mediation and the Parties' agreement as to an extension of the stay of discovery
13 pending mediation on or before April 12, 2019. (Dkt. 50.) The Court entered the Stipulation and Order
14 on April 1, 2019. (Dkt. 51.)

15 3. The Parties have reached an agreement as to a mediator, and the Parties' efforts to
16 confirm a mediation date are ongoing. The Parties thus require additional time to complete the
17 scheduling of the mediation and, as such, agree and stipulate to extend the stay of discovery for an
18 additional fourteen (14) days up through and including April 26, 2019.

19 4. The Parties further agree and stipulate that, on or before April 26, 2019, the Parties will
20 provide the Court with a status report concerning the scheduling of the mediation and inform the Court
21 of the Parties' agreement as to an extension of the stay of discovery pending mediation.

22 5. This is the Parties' second request to extend the stay of discovery.
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6. There is good cause to extend the stay. An extension of the stay will allow the Parties to focus their continuing efforts on early resolution in an efficient manner and save the Parties' time and expense of discovery. Moreover, as no trial in this matter has been set, the requested extension of the stay does not require a change to any trial date. The Parties jointly request to extend the stay. Neither Party to this lawsuit will be prejudiced by the extension of the stay.

IT IS SO AGREED AND STIPULATED:

Dated this 12th day of April, 2019

Lapidus & Lapidus, PLC

By: /s/ Daniel C. Lapidus

JIM D. BAUCH
DANIEL C. LAPIDUS
RYAN D. LAPIDUS
Lapidus & Lapidus, PLC
177 South Beverly Drive
Beverly Hills, California 90212

In Association With:

JOSHUA M. DICKEY
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302

Attorney for Sunrise Hospital and Medical Center, LLC

Dated this 12th day of April, 2019

REED SMITH LLP

By: /s/ Karen E. Vaysman

KEVIN D. TESSIER
KAREN E. VAYSMAN
10 South Wacker Drive
Chicago, Illinois 60606

In Association With:

JAMES J. PISANELLI, ESQ.
DEBRA L. SPINELLI, ESQ.
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Attorneys for Rocky Mountain Hospital and Medical Service, Inc. d/b/a Anthem Blue Cross and Blue Shield and HMO Colorado Inc. d/b/a HMO Nevada

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 15, 2019

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